

UNITED STATES BANKRUPTCY COURT DISTRICT OF PUERTO RICO

In Re:

Rafael A. Castro Beretta

Maria M. Dones Sandoval

Debtors

Case No. 12-05806-MCF

Chapter 13

MOTION TO EXTEND TIME TO RESPOND TO THE MOTION PRESENTED  
TO ORDER A LINEN CANCELLATION

TO THE HONORABLE COURT:

Comes Creditors, Asociación de Residentes El Alamo, Inc. (AREA), through its' President, respectfully submits the following Motion to Extend the Time to Respond to the Motion Presented to Order a Linen Cancellation. The basis for this request is the following:

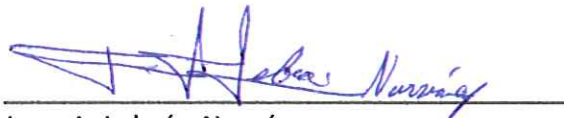
1. On November 2016, a new board was elected for AREA Inc. and its members are newly on the residents' debts and collection cases, which are many. Some of these cases are complex on nature and history.
2. None of the new board members is an attorney at law.
3. The debtor has not paid any maintenance fee since they filed for bankruptcy, owing now a total of \$3,814.70 to AREA.
4. The new board is now seeking legal representation to deal with this case, among others related to debt collection.
5. Creditors respectfully requests at least 30 additional days to allow the new board to find legal representation to support this, and other court cases.
6. This motion is made in good faith and without any intention or purpose of delaying the process.

WHEREFORE, Creditors respectfully pray this Honorable Court to grant this motion and, accordingly, extend the time to respond to the motion presented by the Debtors to order for the cancellation of liens registered within the Registry of Property of Guaynabo in favor of Asociacion de Residentes El Alamo, Inc. dated February 2, 2017.

I also certify that a copy of this motion was sent by US Postal Service, by certified first class mail, to HECTOR VELAZQUEZ HERNANDEZ, Attorney for debtor, PO Box 360847, San Juan, PR 00936-0847.

In Guaynabo, Puerto Rico, this February 24, 2017

Respectfully submitted,



Juan A. Lebrón Narváez  
President  
Asociación de Residentes El Álamo Inc.  
Urb. El Alamo  
C-25 Calle Monterrey  
Guaynabo PR 00969



## AREA Inc.

Urb. El Álamo Calle Monterrey C-25  
Guaynabo P.R. 00969

787-205-5863

PresidenciaJuntaAREA@gmail.com

## Resolución corporativa

Yo, Frank Álvarez, mayor de edad, casado vecino de Municipio de Guaynabo, Puerto Rico y Secretario de la junta de directores de la Asociación de Residentes de El Álamo Inc., bajo juramento declaro:

Que soy de las circunstancias personales aquí descritas.

Que en la Asamblea Anual Ordinaria de 2016 de la Asociación de Residentes El Álamo Inc., con el debido "quorum" requerido en reglamento presente y celebrado el 19 de octubre de 2016, se tomó la siguiente

### RESOLUCION

Se eligió como presidente al Sr. Juan A. Lebrón confiriéndose todos los poderes y responsabilidades de su cargo.

Está autorizado a otorgar cualquier contrato, acuerdo, obligación, y hacer gestiones en representación de la Asociación.

Y PARA QUE CONSTE, firmamos la presente RESOLUCION En Guaynabo, Puerto Rico hoy 19 de octubre de 2016.

#### Presidente

Juan A. Lebrón (106) 787-205-5863-

#### Vice Presidenta

Nilma Santiago (D-7) 787-593-6801

#### Tesorero

Ian A. Feliciano (EX 9) 787-501-1906

#### Secretario

Frank Álvarez (EX 8) 787-370-8949

#### Representantes de Calle:

##### Laredo

Rafael Nevares (A4) 787-402-1038

##### San Antonio

Ligia Romero (D9) 787-638-6071

##### Guadalupe

Héctor Alicea (E33) 787-399-7420

##### Ensenada/Hermosilla

Ricardo Piñero (EX 11) 787-620-4595

##### Alamo Drive

Isaías Rodríguez (115) 939-217-8911

##### San Jacinto

Vacante

##### Monterrey

Vacante

##### Veracruz

Vacante

#### Comités:

##### Seguridad:

Jorge Ramírez (D9) 787-449-1094

Rafael Nevares (A4) 787-402-1038

Juan A. Lebrón (106) 787-205-5863

##### Membresías:

Wanda Rodríguez (EX9) 787-501-1902

Javier Fernandez (A10) 787-649-9663

Juan Lebrón (106) 787-205-5863

##### Legal

Wanda Rodríguez (EX9) 787-501-1902

Rafael Marchand (C4) 787-486-1346

Juan A. Lebrón (106) 787-205-5863

  
Frank Álvarez  
Secretario

  
Ian A. Feliciano  
Tesorero

  
Nilma Santiago  
Vice-presidenta

